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January 19, 2023

VIA EMAIL

The Honorable Jed S. Rakoff United States Courthouse 500 Pearl Street, Room 1340 New York, NY 10007

Re: SEC v. GEL Direct Trust, et al 22-cv-09803-JSR (SDNY)

Hon. Rakoff:

Yesterday, pursuant to the Court's Individual Rules #2(b), counsel for all parties called Chambers and spoke with Adam Kern about Defendants' contemplated motion to dismiss the referenced matter. Mr. Kern recommended we submit this letter application.

Currently, the Defendants' deadline to answer, move or otherwise respond is tomorrow, January 20, 2023. The case management conference is currently scheduled for next Tuesday, January 24, 2023. Defendants respectfully request that their time to answer, move or otherwise respond to the Complaint be extended until a new date can be set at Tuesday's case management conference, when a briefing schedule for the motion to dismiss can also be set.

The SEC indicated that it had no objection to this request.

Respectfully submitted,

So ordered

January 19, 2023

Ionathan Uretsky, Esq. Counsel for Defendants